

for the Central District of California

FILED

ORIGINAL

DEC 27 2011

A11CR 708 LY

United States of America

v.

Frederic Alan Gladle

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS No.

11-CR-01170

DEPUTY CLERK

Consent to Transfer of Case

for Plea and Sentence

(Under Rule 20)

FILED  
2011 DEC 16 PM 3:04  
FEDERAL DISTRICT COURT  
LOS ANGELES  
NY

I, Frederic Alan Gladle, defendant, have been informed that a information ☒ (indictment, information, complaint) is pending against me in the above designated cause. I wish to plead guilty ☒  
(guilty, nolo contendere) to the offense charged, to consent to the disposition of the case in the Western  
District of Texas in which I am under arrest ☒ (am under arrest, am held) and to waive  
trial in the above captioned District.

Dated: \_\_\_\_\_ at \_\_\_\_\_  
Frederic Alan Gladle  
(Defendant)

(Witness) \_\_\_\_\_  
[Signature]  
(Counsel for Defendant)

Approved

Andre Bisette  
United States Attorney for the  
Central District of  
California

[Signature]  
United States Attorney for the  
Western District of  
Texas

**2:11-cr-01170-URC USA v. Gladle****Date filed:** 12/09/2011**Date terminated:** 12/16/2011**Date of last filing:** 12/16/2011

## History

| <b>Doc. No.</b> | <b>Dates</b>                                           | <b>Description</b>                                 |
|-----------------|--------------------------------------------------------|----------------------------------------------------|
| <u>6</u>        | <i>Filed:</i> 12/09/2011<br><i>Entered:</i> 12/13/2011 | Information - Felony                               |
| <u>7</u>        | <i>Filed:</i> 12/09/2011<br><i>Entered:</i> 12/13/2011 | Case Summary (CR-72)                               |
| <u>8</u>        | <i>Filed:</i> 12/09/2011<br><i>Entered:</i> 12/13/2011 | Memorandum by U S Attorney re Investigative Action |
| <u>9</u>        | <i>Filed:</i> 12/16/2011<br><i>Entered:</i> 12/20/2011 | Rule 20 - Consent to Transfer Out                  |

| PACER Service Center   |                   |                         |                   |
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| <b>Description:</b>    | History/Documents | <b>Search Criteria:</b> | 2:11-cr-01170-URC |
| <b>Billable Pages:</b> | 1                 | <b>Cost:</b>            | 0.08              |

Memorandum

CR 11 01170

FILED



Subj:  
UNITED STATES v. FREDERIC ALAN  
GLADLE,

Date:  
December 28, 2011 -9 AM 11:23

CLERK, DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

To: TERRY NAFISI  
Clerk, United States District Court  
Central District of California

From: EVAN J. DAVIS  
Assistant United States Attorney  
Criminal Division

The accompanying matter being filed on [date],

\_\_\_\_\_ relates to X does not relate to

(1) a matter pending in the Criminal Division of the USAO at any time between October 2002 and October 5, 2003, the dates during which Jacqueline Chooljian was Chief of the Criminal Division in the USAO; (2) a matter pending in the Major Frauds Section of the USAO at any time between October 5, 2003 and January 6, 2006, the date on which Jacqueline Chooljian resigned her appointment in the USAO; or (3) a matter in which Jacqueline Chooljian was personally involved or on which she was personally consulted while employed in the USAO.

\_\_\_\_\_ relates to X does not relate to

a matter in which Patrick J. Walsh was personally involved or on which he was personally consulted while employed in the USAO.

\_\_\_\_\_ relates to X does not relate to

(1) a matter pending in the Riverside Branch of the USAO at any time between October 2, 2006 and April 4, 2011, the dates spanning the date when Sheri Pym became the Chief of the Riverside Branch of the USAO and the date when she resigned her appointment in the USAO; or (2) a matter in which Sheri Pym was personally involved or on which she was personally consulted while employed in the USAO.

X relates to \_\_\_\_\_ does not relate to

(1) a matter pending in the Major Frauds Section of the USAO at any time between May 8, 2009 and March 31, 2011, the dates spanning the date when Michael Wilner became a Deputy Chief of the Major Frauds Section of the USAO and the date when he resigned his appointment in the USAO; or (2) a matter in which Michael Wilner was personally involved or on which he was personally consulted while employed in the USAO.

X relates to \_\_\_\_\_ does not relate to

(1) a matter pending in the Appellate Section of the USAO at any time between February 2002 and May 2002, the time period during which Jean Rosenbluth served as the Chief of the Appellate Section of the USAO; (2) a matter in which Jean Rosenbluth was personally involved or on which she was personally consulted while employed in the USAO (between 10/1/95 and 5/31/02 as an Assistant United States Attorney, and between 8/1/02 and 7/31/08 as a Special Assistant United States Attorney); or (3) a matter in which current Assistant United States Attorney Richard Robinson is or has been personally involved or on which he has personally consulted while employed in the USAO.

  
EVAN J. DAVIS  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

FILED

CASE SUMMARY

Case Number CR 11 01170 Defendant Number 1  
U.S.A. v. FREDERIC ALAN GLADLE Year of Birth 1958 2011 DEC -9 AM 11:23  
☐ Indictment ☒ Information Investigative agency (FBI, DEA, etc.) FBI, SIGTARP

NOTE: All items are to be completed. Information not applicable or unknown shall be indicated as N/A

**OFFENSE/VENUE**

- a. Offense charged as a:  
☐ Misdemeanor ☐ Minor Offense ☒ Felony  
☐ Petty Offense ☐ Class B Misdemeanor
- b. Date of offense 10/2007-10/2011
- c. County in which first offense occurred  
Los Angeles
- d. The crimes charged are alleged to have been committed in:

CHECK ALL THAT APPLY

- ☒ Los Angeles ☐ Ventura  
☐ Orange ☐ Santa Barbara  
☐ Riverside ☐ San Luis Obispo  
☒ San Bernardino ☒ Other nationwide

Citation of offense 18 U.S.C. Section 157, 18 U.S.C. Section 1028A

**RELATED CASE**

Has an indictment or information involving this defendant and the same transaction or series of transactions been previously filed and dismissed before trial? ☒ No ☐ Yes

IF YES Case Number \_\_\_\_\_

Pursuant to Section 11 of General Order 08-05, criminal cases may be related if a previously filed indictment or information and the present case:

- a. arise out of the same conspiracy, common scheme, transaction, series of transactions or events; or  
b. involve one or more defendants in common, and would entail substantial duplication of labor in pretrial, trial or sentencing proceedings if heard by difference judges.

Related case(s), if any: **MUST MATCH NOTICE OF RELATED CASE** n/a

**PREVIOUSLY FILED COMPLAINT**

A complaint was previously filed on: 10/14/2011  
Case Number 11-2410M  
Charging 18 U.S.C. Section 1341, mail fraud

The complaint: ☒ is still pending  
☐ was dismissed on: \_\_\_\_\_

**COMPLEX CASE**

BY \_\_\_\_\_

Are there 8 or more defendants in the Indictment/Information?  
☐ Yes\* ☒ No

Will more than 12 days be required to present government's evidence in the case-in-chief?  
☐ Yes\* ☒ No

\*AN ORIGINAL AND 3 COPIES (UNLESS ELECTRONICALLY FILED) OF THE NOTICE OF COMPLEX CASE MUST BE FILED 2 BUSINESS DAYS BEFORE THE ARRAIGNMENT IF EITHER YES BOX IS CHECKED.

**Superseding Indictment/Information**

IS THIS A NEW DEFENDANT? ☐ Yes ☒ No

This is the \_\_\_\_\_ superseding charge, i.e. 1<sup>st</sup>, 2<sup>nd</sup>.  
The superseding case was previously filed on: \_\_\_\_\_

Case Number \_\_\_\_\_

The superseded case:  
☐ is still pending before Judge/Magistrate Judge

☐ was previously dismissed on \_\_\_\_\_

Are there 8 or more defendants in the superseding case?  
☐ Yes\* ☐ No

Will more than 12 days be required to present government's evidence in the case-in-chief?  
☐ Yes\* ☐ No

Was a Notice of Complex Case filed on the Indictment or Information?  
☐ Yes ☐ No

\*AN ORIGINAL AND 3 COPIES OF THE NOTICE OF COMPLEX CASE MUST BE FILED 2 BUSINESS DAYS BEFORE THE ARRAIGNMENT IF EITHER YES BOX IS CHECKED.

Is an interpreter required: ☐ Yes ☒ No  
IF YES, list language and/or dialect: \_\_\_\_\_

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CASE SUMMARY

**OTHER**

☒ Male ☐ Female  
☒ U.S. Citizen ☐ Alien  
Alias Name(s) Jake Menefee, Larry Stauffer, Walter Fred  
Boyd, Jack Heller, and Kevin Dorsey

This defendant is charged in: ☒ All counts  
☐ Only counts: \_\_\_\_\_

☐ This defendant is designated as "High Risk" per  
18 USC 3146(a)(2) by the U.S. Attorney.  
☐ This defendant is designated as "Special Case"  
per 18 USC 3166(b)(7).

Is defendant a juvenile? ☐ Yes ☒ No  
IF YES, should matter be sealed? ☐ Yes ☐ No

The area of substantive law that will be involved in this case  
includes:

☒ financial institution fraud ☐ public corruption  
☐ government fraud ☐ tax offenses  
☐ environmental issues ☐ mail/wire fraud  
☐ narcotics offenses ☐ immigration offenses  
☐ violent crimes/firearms ☐ corporate fraud  
☒ Other: bankruptcy fraud, ID theft

**CUSTODY STATUS**

Defendant is not in custody:

- a. Date and time of arrest on complaint: \_\_\_\_\_  
b. Posted bond at complaint level on: \_\_\_\_\_  
in the amount of \$ \_\_\_\_\_  
c. PSA supervision? ☐ Yes ☒ No  
d. Is a Fugitive ☐ Yes ☒ No  
e. Is on bail or release from another district: \_\_\_\_\_  
f. ☐ Has not been arrested but will be notified by summons  
to appear.  
g. Warrant requested. ☐ Yes ☒ No

Defendant is in custody:

- a. Place of incarceration: ☐ State ☒ Federal  
b. Name of Institution: Bastrop County Jail, Texas  
c. If Federal: U.S. Marshal's Registration Number:  
49798  
d. ☒ Solely on this charge. Date and time of arrest:  
10/19/2011 at 8:30 a.m.  
e. On another conviction: ☐ Yes ☒ No  
IF YES ☐ State ☐ Federal ☐ Writ of Issue  
f. Awaiting trial on other charges: ☐ Yes ☒ No  
IF YES ☐ State ☐ Federal AND  
Name of Court: \_\_\_\_\_

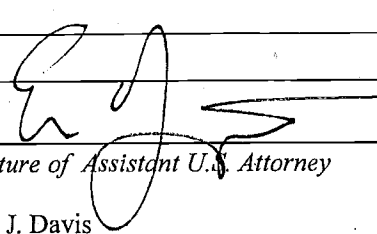
Date transferred to federal custody: \_\_\_\_\_

This person/proceeding is transferred from another district  
pursuant to F.R.CrP. \_\_\_\_ 20 \_\_\_\_ 21 \_\_\_\_ 40

**EXCLUDABLE TIME**

Determinations as to excludable time prior to filing indictment/information EXPLAIN: defendant filed a speedy trial stipulation  
and the parties are pursuing a Rule 20 into the Western District of Texas

Date 12/8/2011

  
Signature of Assistant U.S. Attorney

Evan J. Davis  
Print Name

FILED

2011 DEC -9 AM 11:23

CLERK, U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

CR 11 01170

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
FREDERIC ALAN GLADLE, )  
aka "Jake Menefee," )  
aka "Larry Stauffer," )  
aka "Walter Fred Boyd," )  
aka "Jack Heller," )  
aka "Kevin Dorsey," )  
 )  
Defendant. )

I N F O R M A T I O N

[18 U.S.C. § 157(3):  
Bankruptcy Fraud; 18 U.S.C.  
§ 2: Aiding and Abetting and  
Causing an Act to be Done; 18  
U.S.C. § 1028A: Aggravated  
Identity Theft]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. §§ 157(3), 2]

A. INTRODUCTORY ALLEGATIONS

At all times relevant to this Information:

1. Defendant FREDERIC ALAN GLADLE, also known as "Jake Menefee," "Larry Stauffer," "Walter Fred Boyd," "Jack Heller," and "Kevin Dorsey" ("defendant GLADLE"), was a resident of Austin, Texas, who operated a foreclosure-delay scheme in Los Angeles and San Bernardino Counties, within the Central District

EJD:ejd

1 of California, among other locations. In perpetrating the  
2 scheme, defendant GLADLE did not use his true name and instead  
3 used the following aliases: Jake Menefee, Larry Stauffer, Walter  
4 Fred Boyd, Jack Heller, and Kevin Dorsey.

5 2. A bankruptcy case is typically commenced with the  
6 filing of a petition for bankruptcy. A person seeking relief  
7 from debts, referred to as the "debtor," can file a "voluntary  
8 petition" for bankruptcy.

9 3. The filing of a bankruptcy petition triggers what is  
10 known as an "automatic stay" against the debtor's creditors, who  
11 would be immediately forbidden from taking any action on claims  
12 they might have against the debtor or any property owned by the  
13 debtor when the bankruptcy case was commenced, including  
14 foreclosure and eviction actions, unless permission of the  
15 bankruptcy court is first obtained.

16 B. THE SCHEME TO DEFRAUD

17 4. Beginning in or about October 2007, and continuing to  
18 on or about October 19, 2011, in Los Angeles and San Bernardino  
19 Counties, within the Central District of California, and  
20 elsewhere, defendant GLADLE, together with others known and  
21 unknown to the United States Attorney, knowingly and with intent  
22 to defraud, devised, participated in, and executed a scheme to  
23 defraud lenders, some of whom, such as Wells Fargo Bank, were  
24 recipients of funds under the Troubled Asset Relief Program, who  
25 were attempting to foreclose on real properties through trustee  
26 sales, by means of making fraudulent representations, claims, and  
27 promises concerning and in relation to a proceeding under  
28 Title 11 of the United States Code.

1       5.    The purpose of the fraudulent scheme was to hinder,  
2 delay, and obstruct lenders' lawful foreclosure and eviction  
3 actions against property owners who had defaulted on their  
4 mortgages.

5       6.    The fraudulent scheme operated, in substance, as  
6 follows:

7           a.   Defendant GLADLE distributed and caused to be  
8 distributed advertisements to solicit distressed homeowner  
9 clients who were interested in delaying the foreclosure of their  
10 homes.

11          b.   In addition, defendant GLADLE obtained clients  
12 through referrals from existing clients and from salespersons  
13 hired by defendant GLADLE.

14          c.   Through these advertisements and salespersons,  
15 defendant GLADLE told potential clients whose properties were  
16 being foreclosed upon (the "distressed properties") that, in  
17 exchange for a monthly fee, defendant GLADLE would assist in  
18 postponing the foreclosure for at least six months. The clients  
19 generally were not told that the postponement would be achieved  
20 through defendant GLADLE's use of bankruptcy petitions filed by  
21 debtors who were unaware of defendant GLADLE's use of their names  
22 and bankruptcy petitions.

23          d.   After a client had signed up and paid the required  
24 fee, the salespersons, operating at defendant GLADLE's direction,  
25 would obtain a client's notarized signature on a deed  
26 transferring a fractional share, generally 1/100th interest, of  
27 their distressed property (the "fractional deed") to a debtor  
28 whose name defendant GLADLE had obtained by accessing an



1 electronic bankruptcy court docketing system called PACER.

2 e. Defendant GLADLE would direct the client and the  
3 salesperson to record the deed transferring the fractional  
4 interest to the debtor, and to send the recorded deed to  
5 defendant GLADLE by facsimile.

6 f. Defendant GLADLE would download the debtor's  
7 bankruptcy petition from PACER.

8 g. After obtaining the bankruptcy petition and the  
9 recorded fractional deed, defendant GLADLE or a co-schemer  
10 operating at his direction would fax a copy of the recorded  
11 fractional deed and the bankruptcy petition, both of which listed  
12 the same debtor's name, to the client's lender or the lender's  
13 representative, thereby notifying the lender of the automatic  
14 stay in order to stop the foreclosure sale.

15 h. Upon receiving the facsimile from defendant GLADLE  
16 containing the recorded fractional deed and bankruptcy petition,  
17 some lenders would file a motion for relief from stay in the  
18 debtor's bankruptcy case. Generally, in response to the motion,  
19 the debtor would disclaim any knowledge of owning the fractional  
20 interest in the distressed property, and the bankruptcy court  
21 would grant the motion and permit the foreclosure on the  
22 distressed property to continue.

23 i. Once another foreclosure sale was scheduled,  
24 defendant GLADLE would cause the client to sign another deed  
25 transferring another fractional share of the distressed property  
26 to a different debtor, print out the debtor's bankruptcy petition  
27 from PACER, and send both documents to the lender or the lender's  
28 representative.

1           j. Defendant GLADLE would repeat this course of  
2 action, thereby repeatedly delaying the sale of the subject  
3 properties, for as long as the client paid the monthly fee. In  
4 this way, defendant GLADLE was able to delay the foreclosure for  
5 years on some properties.

6           k. If a client requested that defendant GLADLE  
7 reverse the fractional deed transfers and paid a fee to defendant  
8 GLADLE, then defendant GLADLE would prepare pre-notarized  
9 reconveyance documents showing that the debtors were transferring  
10 their fractional interests to the client, forge the signatures of  
11 the debtors, and send the reconveyance documents to the client.

12       7. As part of the above-described fraudulent scheme, from  
13 on or about December 1, 2007, through on or about October 19,  
14 2011, defendant GLADLE and his co-schemers delayed the  
15 foreclosure sales of approximately 1,128 distressed properties.  
16 During that same period, defendant GLADLE collected at least  
17 \$1,600,000 from clients in monthly fees paid for his illegal  
18 foreclosure-delay services.

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1 C. EXECUTION OF THE SCHEME TO DEFRAUD

2 8. On or about June 15, 2009, within the Central District  
3 of California, and elsewhere, for the purpose of executing and  
4 attempting to execute the above-described scheme, defendant  
5 GLADLE, using the alias "Kevin Dorsey," sent and caused to be  
6 sent a facsimile from Austin, Texas, to California Reconveyance  
7 in Chatsworth, California, containing a grant deed from M.A.G.  
8 and L.A. to S.C., along with a bankruptcy petition bearing case  
9 number 09-21169-AJC in the name of S.C., filed in the United  
10 States Bankruptcy Court for the Southern District of Florida,  
11 with the intent to defraud a lender.

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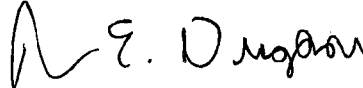
28 //

COUNT TWO

[18 U.S.C. § 1028A]

9. On or about October 19, 2011, in Travis County, within the Western District of Texas, defendant FREDERIC ALAN GLADLE, also known as "Jake Menefee," "Larry Stauffer," "Walter Fred Boyd," "Jack Heller," and "Kevin Dorsey," knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, that is, a social security number issued to J.M., during and in relation to using unauthorized access devices to obtain a thing of value totaling at least \$1,000, a felony violation of Title 18, United States Code, Section 1029(a)(2).

ANDRÉ BIROTTE JR.  
United States Attorney

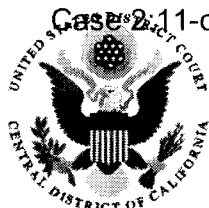


ROBERT E. DUGDALE  
Assistant United States Attorney  
Chief, Criminal Division

BEONG-SOO KIM  
Assistant United States Attorney  
Chief, Major Frauds Section

EVAN J. DAVIS  
Assistant United States Attorney  
Major Frauds Section

PAUL ROSEN  
Trial Attorney  
Fraud Section, Criminal Division  
United States Department of Justice



Case 2:11-cr-01170-URC Document 9-1 Filed 12/16/11 Page 1 of 1 Page ID #:94  
 UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION  
 312 North Spring Street, Room G-8  
 Los Angeles, CA 90012  
 Tel: (213) 894-3535

SOUTHERN DIVISION  
 411 West Fourth Street, Suite 1053  
 Santa Ana, CA 92701-4516  
 (714) 338-4750

EASTERN DIVISION  
 3470 Twelfth Street, Room 134  
 Riverside, CA 92501  
 (951) 328-4450

**TERRY NAFISI**  
 District Court Executive and  
 Clerk of Court

Date: 12/20/11

RECEIVED

DEC 27 2011

Western District Of Texas

200 West Eighth Street

Austin, TX 78701

Transfer of ☒ Criminal Case or ☐ Magistrate Case

Case No. CR 11-1170

Case Title: USA v Frederic Alan Gladle

CLERK, U.S. DISTRICT COURT  
 WESTERN DISTRICT OF TEXAS

BY MJC  
 DEPUTY CLERK

Dear Sir/Madam:

A11CR 708 LY

**Pursuant to F.R.C.R.P. 5:**

- ☐ Certified copy of case file documents (Filed prior to January 1, 2007\*\*) and docket sheet
- ☐ This is an electronically filed case and the documents are available through pacer
- ☐ Not for public view document (pursuant to Judicial Conference policy)
- ☐ Original Bond or ☐ Original Bond to be forwarded by Fiscal
- ☐ Original Passport or ☐ Declaration re: Passport
- ☐ Original Passport (received on or after 1-1-07) will be transferred by Pretrial Services
- ☐ Other

**Pursuant to ☒ F.R.C.R.P. 20 / ☐ F.R.C.R.P. 21:**

- ☒ This is an electronically filed case and the document are available through pacer.
- ☐ Certified copy of docket sheet
- ☐ Certified copy of Indictment / Information\*\* ☐ Original Consent of defendant
- ☐ Original Passport or ☐ Declaration re: Passport
- ☐ Original Passport (received on or after 1-1-07) will be transferred by Pretrial Services
- ☐ Not for public view document (pursuant to Judicial Conference policy)
- ☒ Other SEALED Magistrate case attached

**\*\*Note: Documents filed on or after January 1, 2007 are available electronically through PACER.**  
 Electronically filed documents can be retrieved by using your court's pacer account .

Sincerely,

Clerk, U.S. District Court

By Janet\_Aghbolaghi@cacd.uscourts.gov  
 Deputy Clerk

cc: U.S. Attorney -Central District of California and Receiving District, Pretrial Services

**TO BE COMPLETED BY RECEIVING DISTRICT**

Please acknowledge receipt via e-mail to the appropriate address listed below and provide the case number:

- ☒ CrimIntakeCourtDocs-LA@cacd.uscourts.gov (Los Angeles Offices)
- ☐ CrimIntakeCourtDocs-RS@cacd.uscourts.gov (Riverside Office)
- ☐ CrimIntakeCourtDocs-SA@cacd.uscourts.gov (Santa Ana Office)

Case No: \_\_\_\_\_

Clerk, U.S. District Court

Date \_\_\_\_\_

By: \_\_\_\_\_  
 Deputy Clerk